

CC Docket No. 94-102 – September 2005 E911 Interim Report

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Date: September 2005

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By Electronic Submission:

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TIER III CARRIER INTERIM REPORT
September 2005
CC Docket No. 94-102

Chama Wireless, L.L.C. ("Chama") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 7709, 7771 ¶172 (2005) ("*Order*").

Carrier Identifying Information:

Carrier Name: Chama Wireless, L.L.C. – FRN 0007-2672-14

E911 Compliance Officer: Petr Valkoun
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Atlanta, GA 30350

E911 Implementation Information:

Chama is operating as a "carriers' carrier", *i.e.*, Chama serves only the customers of other carriers. Thus, Chama has no subscribers and will not have any subscribers. Based on this premise, Chama hereby reports as follows:

- Chama still has not received any Phase I or Phase II E-911 requests from PSAPs. Chama has installed all of the equipment and software necessary to meet any Phase I request it may receive from a PSAP, but will have to work with the local exchange carrier ("LEC") to have a landline installed between the switch and a requesting PSAP for Phase I deployment when the time comes. It could take a LEC as long as 12 or even 18 months to install a new landline in the rural areas where Chama is operating.

Chama has no subscribers, thus Chama does not have the means to fund any Phase I or Phase II implementation and recurring costs via pass-throughs to subscribers. Because Chama anticipates receiving its first Phase I request in the near future from a PSAP in its New Mexico market, Chama is beginning to explore the availability of any state or local cost recovery programs for E-911 implementation in that state. The State of New Mexico has a cost recovery program; there are no cost recovery programs available on the local level (*e.g.*, by county or PSAP). Chama has been in contact with a representative from the State of New Mexico Department of Finance and Administration Local Government Division ("Division"), which administers the cost recovery program, and is currently reviewing the Division's Cost Recovery Guidelines. Chama also received and is reviewing a draft of the CMRS Carrier Service Agreement, which Chama must enter into with the requesting PSAP as a prerequisite to applying for cost recovery from the Division.

- Chama elected a handset-based solution. Chama is using analog and TDMA technology with a GSM overlay at all of its cell sites.^{1/} Chama has obtained and installed all of the equipment and software that is necessary to meet any Phase I request that it may receive from a PSAP, but will have to work with local exchange carriers (“LEC”) to have a landline installed between the switch and a requesting PSAP for Phase I deployment when the time comes. It could take a LEC as long as 12 or even 18 months to install a new landline in the rural areas where Chama is operating.
- Chama continues to anticipate a significant problem with its Phase II E-911 deployment. There is currently no Phase II-compliant handset-based solution available for either TDMA or GSM technology, and it appears from all available market information that one will not become available any time in the near future. As previously reported, a network-based Phase II solution is technically impossible in any of Chama’s unserved area markets. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

Chama operates four cellular systems located only in remote, rural areas, and the cell sites in each market are spread far apart. Three of Chama’s systems consist of a single, stand-alone cell site each, and thus none are susceptible to triangulation or AOA techniques. The fourth system consists of three cell sites, but there is only a tiny overlap between two of the cells, and no overlap among all three cells. Thus, this service area is not susceptible to triangulation techniques, and only a very small portion of this service area is susceptible to AOA techniques. Therefore, even if Chama were to implement a network-based Phase II solution in this market, it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules. Thus, Chama could never employ a network-based solution in any of its cellular markets.

- For the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA or GSM handsets and the impossibility of employing a network-based solution, both of which are beyond Chama’s control, Chama does not anticipate that full Phase II service will be available in its networks any time in the near future. Chama has a request pending with the Commission for a permanent waiver of the Phase II requirements. Chama is continuing to monitor the marketplace for new technology that will provide adequate Phase II E-911 service to rural markets such as its markets.
- With regard to meeting the ultimate implementation date of December 31, 2005, see above.

^{1/} Chama is also adding CDMA overlays to its cell sites as demand from its roaming customers dictates. Chama’s CDMA overlays will operate off of a switch in Iowa owned and operated by an unaffiliated carrier, pursuant to a written agreement. Since Chama has not received any Phase II requests, it has not moved forward with Phase II on the CDMA level.